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February 26, 2024

Via ECF

Hon. Denise L. Cote  
U.S. District Court, Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Steven Hirsch v. Valnet US Inc.*  
Docket No: 1:23-cv-11202-DLC

Dear Judge Cote:

We are the attorneys for Plaintiff Steven Hirsch ("Plaintiff") in this matter. Pursuant to Section I(E) of Your Honor's Individual Practices, we write to respectfully request an adjournment of the initial conference date until at least 14 days after Defendant Valnet, Inc. ("Defendant")'s deadline for responding to the Complaint. The adjournment would permit the parties to competently discuss the required topics under Rule 26(f) and the most appropriate case management plan based on Defendant's response to the Complaint. Further, the additional time will help conserve resources which will facilitate the parties' settlement discussions.

Defendant executed a waiver of service on January 3, 2024, setting April 2, 2024 as Defendant's deadline to answer the Complaint (ECF No. 10). The initial conference is currently set for March 6, 2024. Defendant consents to this request and no adjournments or extensions were previously sought.

We thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ Renee J. Aragona  
Renee J. Aragona

cc: Lindsay R. Edelstein, Esq.  
Mitchell Silberberg & Knupp LLP  
Via email to lre@msk.com  
Counsel for Defendant

*The conference is adjourned  
to 4/19 at 4:00  
for  
Denise Cote  
2/26/24*